

UNITED STATE BANKRUPTCY COURT
DISTRICT OF PUERTO RICO

IN RE:

IRMA ADELINA RODRÍGUEZ COSSÍO

CASE NO. 16-05295 EAG

DEBTOR(S)

NOREEN WISCOVITCH RENTAS
CHAPTER 7 TRUSTEE

CHAPTER 7

PLAINTIFF

ADV. PROC. 18-00050

VS.

IRMA ADELINA RODRÍGUEZ COSSÍO

DEFENDANT

AVOIDANCE OF POST
PETITION TRANSACTIONS;
REVOCATION OF DISCHARGE
INJUNCTION

MOTION FOR EXTENSION OF TIME

TO THE HONORABLE COURT:

COMES NOW, Herman F. Valentín Figueroa, counsel for defendant and very respectfully states and prays:

1. On June 5, 2018 appearing counsel filed a motion on behalf of debtor-defendant requesting additional time to plead. The request was made making July 5, 2018 the requested deadline to file a pleading and the same was granted by the Court.

2. Currently there are differences between the undersigned counsel and the defendant that make it difficult to engage in a proper legal representation and may result in the resignation of

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counsel. The matters regarding the legal representation are still subject to discussion until a final determination is reached.

3. Due to these circumstances the undersigned counsel hereby requests a seven-day extension to inform the Court of the status of defendant's legal representation and an extension to file her responsive pleading.

WHEREFORE, it is respectfully requested from the Court to grant the extension of time to file a motion regarding the status of defendant's legal representation and to answer the complaint.

RESPECTFULLY SUBMITTED.

I hereby certify that on this same date the present motion has been filed with the U.S. Bankruptcy Court for the District of Puerto Rico who will electronically notify this document to the Trustee, **Noreen Wiscovitch Rentas, Esq.** at courts@nwr-law.com, nwiscovitch@ecf.epiqsystems.com, the **Office of the U.S. Trustee** at ustpregion21.hr.ecf@usdoj.gov and counsel for the Trustee, **Noemí Landrau Rivera, Esq.** at nlandrau@landraulaw.com in the Court's CM-ECF System.

In San Juan, Puerto Rico, this 5th day of July 2018.

HERMAN F. VALENTÍN & ASSOCIATES

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By: /s/Herman F. Valentín Figueroa
Herman F. Valentín Figueroa
USDC-PR # 201904